

Laurie Garland

July 6, 2021

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IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF OKLAHOMA

LAURIE GARLAND,)	
)	
Plaintiff,)	
)	
vs.)	NO. CIV-20-306-RAW
)	
)	
STATE OF OKLAHOMA, ex rel)	
OKLAHOMA DEPARTMENT OF)	
CORRECTIONS,)	
CHRISTOPHER REDEAGLE,)	
individually,)	
SHARON McCOY, individually,)	
JOE ALLBAUGH, individually,)	
RABECKAH MOONYHAM,)	
individually,)	
HEATHER CARLSON, individually,)	
and BOARD OF CORRECTIONS,)	
)	
Defendants.)	

DEPOSITION OF LAURIE ELIZABETH GARLAND
TAKEN ON BEHALF OF THE DEFENDANTS
IN OKLAHOMA CITY, OKLAHOMA
ON JULY 6, 2021, 2021

REPORTED BY: JANA C. HAZELBAKER, CSR

1 criminal justice. And actually went to work for my
2 father, who is now deceased, for his title insurance
3 businesses, as well as oil and gas brokerage.

4 Q Like landman type of thing?

5 A Yes, exactly.

6 Q Is that what you do now?

7 A Not right now. I'm, like, managing a
8 marina down at Lake Murray, my hometown.

9 Q Okay. How long have you been doing that?

10 A Just since May. Just opened up in May.

11 Q Is it a new marina?

12 A Yes, it's brand new.

13 Q Okay. What's the name of it?

14 A Murray Harbor.

15 Q Do you live in Ardmore still?

16 A Yes.

17 Q Okay. And do you live by yourself there?

18 A No.

19 Q With whom do you live?

20 A With Jason Watterson, my boyfriend.

21 Q And how long have you all lived together?

22 A Since 2017.

23 Q Was Mr. Watterson your significant other
24 when you went to prison?

25 A Yes.

1 Q Was the one in Stillwater -- or was that
2 presumably while you were in school?

3 A Under- -- under- -- just underage. Zero
4 tolerance.

5 Q Right. Okay. And you said that -- I guess
6 you went back to prison in 2018?

7 A Yes, sir.

8 Q What was that for?

9 A DUIs.

10 Q Also DUI?

11 A That's the only charge I have.

12 Q This is the only thing you've ever been
13 charged with, DUI or DUI-related charges?

14 A Yes.

15 Q Okay. And, I guess, when were you released
16 from prison this last time?

17 A I was released on an ankle monitor in 2019
18 and re-admitted to finish my sentence in 2020, and
19 finished up in April. April 2nd is when I finished
20 my sentence. 2021.

21 Q Okay. But that was all on the same
22 sentence?

23 A Right. Correct.

24 Q Okay. I guess, since the time that you
25 were discharged, have you had any other charges?

1 Q Okay. So that I'm clear about it,
2 Building 8 is the administrative offices for all of
3 the Eddie Warrior staff?

4 A Right. Correct.

5 Q However, the warden, deputy warden and
6 chief of security are in a different building?

7 A Correct.

8 Q Okay. So the reason why the deputy warden
9 would be coming to Building 8 would be to interact
10 with the administrative staff?

11 A Normally.

12 Q Right. Okay. I guess, was anything else
13 there at Building 8 besides administrative staff?

14 A They served lunch, so --

15 Q So, like, a cafeteria of some sort or
16 something?

17 A They catered, yes.

18 Q More of a break room type thing?

19 A Yes.

20 Q Okay. Wasn't like a full kitchen or
21 anything, I guess is what I'm asking.

22 A No.

23 Q And it was while you were working there
24 that you first met Mr. Redeagle?

25 A Correct.

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1 Q Okay. Was it just in passing or did you
2 guys have a conversation? What happened?

3 A He introduced himself to me, asked why I
4 was there, what brought me to prison, and we
5 discussed that. And he said he knew certain people
6 that I knew and vice versa, but I -- I mean, it was
7 just a short conversation there at the beginning.

8 Q Other people that you knew, meaning other
9 inmates or --

10 A No, other people outside of the facility.

11 Q Okay. Do you remember who it was that you
12 all knew in common?

13 A Yes.

14 Q Who was that?

15 A Joe Ben Mashunkashey.

16 MR. DALTON: Hold on. I didn't hear the
17 last name.

18 THE WITNESS: Mashunkashey.

19 MR. DALTON: Mashunkashey?

20 THE WITNESS: M-a-s-h-u-n-k-a-e-y
21 (verbatim).

22 Q (By Mr. Allen) And you said his first name
23 was Joe?

24 A Joe Ben, yes.

25 Q Joe Ben. Okay. And how do you know him?

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1 A I was roommates in college with his
2 daughter, and also grew up with her, and her parents
3 later split. And he's from Osage County.

4 Q "He," meaning --

5 A His family is from there, et cetera, so
6 when they divorced he went back to Osage County.

7 Q So this is Joe Ben's family --

8 A Correct.

9 Q -- is from Osage County?

10 A Right.

11 Q And that's how Christopher Redeagle knew
12 him?

13 A I assume.

14 Q Okay. So you guys had this one first
15 encounter, brief discussion about happening to know a
16 certain person outside of the facility.

17 When was your next meeting?

18 A When was our next meeting?

19 Q When was the next time that you had a
20 personal encounter?

21 A Well, I saw him, generally, every day.

22 Q Okay. So from that time in August of 2018,
23 you basically saw him every day thereafter?

24 A Correct.

25 Q Okay. Did you guys talk every day?

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1 A He would sometimes -- he would a lot of the
2 time wait on me to be at work at certain hours, yeah.

3 Q What do you mean by that?

4 A I mean that I had certain duties that I was
5 obligated to.

6 Q What were your duties?

7 A Basically, cleaning up everything, taking
8 out the trash, janitorial type stuff, but basically
9 taking care of everything that they needed, cleaning
10 their offices, et cetera.

11 Q Okay. And so you said Mr. Redeagle would
12 wait for you?

13 A Yes.

14 Q There at Building 8?

15 A Yes.

16 Q And where would he wait?

17 A In the break room.

18 Q Okay. And so then you would come into the
19 break room and you guys would have some sort of
20 interaction?

21 A Not necessarily. There's a lot of times
22 that my coworkers that I worked with -- it was kind
23 of a privilege to work there in that specific area.

24 And he would ask my coworkers, "Where's
25 Laurie? When is she going to be here?" Or leave me

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1 notes.

2 Q What kind of notes are we talking about?

3 A Well, like notes on -- like he's made
4 different notes, he's sent cards, et cetera.

5 Q So he left you a note with these coworkers?

6 A In the janitorial closet, yes.

7 Q Okay. So kind of secretly?

8 A Yes.

9 Q And they're just random notes or, I
10 guess --

11 A They just said, "From your secret admirer."

12 Q Okay. How did you know it was him?

13 A Because he told me to go look underneath
14 the -- certain, like, floor cleaning pads, et cetera,
15 different stuff that we had in the break room -- or
16 in the office.

17 Q Okay. So he would place notes but kind of
18 give you a clue as to where to find them?

19 A Conspicuously, yes.

20 Q All right. So, I guess, how long did this
21 note-writing campaign go on before you guys had, I
22 guess, expanded your relationship?

23 A Approximately, five months.

24 Q Okay. And did you also write him notes in
25 this same way?

1 A Yes.

2 Q Was that on a regular basis?

3 A Pretty consistently, yes.

4 Q Okay. What was the nature of the verbal
5 conversations that you all would have?

6 A Well, it started out very informal, just
7 like I said, he asked, you know, "What are you doing
8 here, what brings to you prison," et cetera.

9 We started talking and he just --
10 conversations were minimal for a certain degree, but
11 then it just escalated into, "Well, I really want to
12 kiss you," and things of that nature --

13 Q Right.

14 A -- which was uncomfortable.

15 Q Right. Did you, I guess, respond to him in
16 any way that was, I guess, romantic in these verbal
17 conversations?

18 A In verbal conversations? No. But I did in
19 letters, yes.

20 Q Okay. And who would you say wrote the
21 first letter?

22 A I did.

23 Q Okay.

24 A It gets lonely in prison, so you write.

25 You just take yourself on a little mind trip journey.

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1 A I believe it was starting to escalate
2 somewhat, but it could have been a figment of the
3 imagination at that time.

4 Q What do you mean by "a figment of the
5 imagination"?

6 A Well, writing letters is -- I mean, I can
7 write a novel, basically. It doesn't have to be one
8 specific person really --

9 Q Okay.

10 A -- as far as that's concerned. I mean --

11 Q Yeah. So I guess you had a building
12 fantasy of a relationship with Mr. Redeagle at that
13 point?

14 A No.

15 Q Okay. What was your relationship with him
16 at the point that you wrote these -- this note?

17 A I mean, we were getting to know each other.

18 Q Okay. Was it your intent to have a
19 romantic relationship with him?

20 A No.

21 Q Okay. What was your intent in writing the
22 letter?

23 A Not to a sexual degree.

24 Q Okay. What was your intent in writing the
25 letter?

1 conspicuous -- Mr. Redeagle, to be exact, hanging
2 out, making my coworkers feel uncomfortable, waiting
3 on me if I was at a class, or whatever. I mean,
4 that's exactly what I was referring to.

5 Q Okay.

6 A I mean --

7 Q And so I guess you followed it up
8 immediately thereafter with, "All I want is to avoid
9 any drama and make my transition back home as soon as
10 possible as we both know this" -- and then it goes
11 over to the next page -- "type of attack usually
12 presents itself when you" -- and I don't know what
13 that next word is.

14 A "Near."

15 Q Have?

16 A "Near."

17 Q -- "when you near a big blessing in life."

18 So what big blessing in life were you
19 discussing at that time?

20 A There wasn't any particular one, but I'm
21 just speaking spiritual. Usually the devil will
22 attack you right before you get a blessing in life.

23 Q Okay. I see what you're saying.

24 A I mean, it could be anything.

25 Q About midway down this second page -- which

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1 seen, so this never even existed. This is the first
2 time I've seen this. So if there was a casual
3 conversation, absolutely, I'm sure it could have
4 happened. It could have -- there could have been
5 multiple people in there talking about the issue
6 because it was an ongoing deal.

7 Q But you don't have any specific memory of
8 this conversation?

9 A No.

10 (Whereupon, Exhibit Number 9 was marked for
11 identification purposes and made a part of the
12 record.)

13 Q (By Mr. Allen) I am going to give you a
14 document that we'll label Exhibit 9.

15 Okay. Are you familiar with this document?

16 A Absolutely.

17 Q Okay. And it appears to be a document that
18 you signed, correct?

19 A Correct.

20 Q And did you, in fact, handwrite this
21 document?

22 A They asked me to handwrite a document.

23 Q Is this that document that you, in fact,
24 hand wrote?

25 A They -- yes, they asked me to handwrite

1 this document and told me exactly what I needed to
2 put on it.

3 Q Okay. And who is "they"?

4 A It would have been Cox and -- Lieut- -- or
5 Chief Cox, rather. And I don't believe I remember
6 her name. I always forget it. It's whoever was
7 acting lieutenant at the white house at that time for
8 disciplinary.

9 Q Okay.

10 A A lady.

11 Q Okay. And she -- you're saying she was
12 acting lieutenant?

13 A Yeah. They would always switch positions
14 and she was the acting lieutenant at the time.

15 Q Would this be similar to the lieutenant who
16 disciplined you for the phone call?

17 A No.

18 Q Okay.

19 A Not the same person.

20 Q Okay. That's a different position?

21 A Different person, different position.
22 Yeah. She was just a guard.

23 Q Okay. Okay. And so Mr. Cox and this
24 female lieutenant told you to write what's in this
25 letter?

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1 A Correct.

2 Q Okay. Did you have a conversation with
3 them prior to writing this letter?

4 A No. I was pulled in to their office and
5 that's -- it was all -- it all took place at one
6 time.

7 Q Okay. So you got pulled in to Chief Cox's
8 office presumably?

9 A Correct.

10 Q And there was another lieutenant -- female
11 lieutenant there?

12 A Correct.

13 Q And during that time period they just told
14 you to write the letter, or did you guys have a
15 conversation also?

16 A We had a conversation and then they asked
17 me to write this letter. And Mr. Redeagle was
18 actually on vacation at that time.

19 Q Okay. So while you were in the office and
20 having the conversation, what was the conversation
21 about?

22 A They said that it had been brought to their
23 attention that Mr. Redeagle was very friendly with
24 me. And multiple people had brought it to their
25 attention, they'd noticed that I had come into the

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1 office -- gotten called into his office. And,
2 basically, he was absent so they were basically
3 quizzing me about what was going on.

4 Q Right.

5 A At that time -- I mean, I'm in prison, so
6 he has total authority over my life.

7 Q So what did you tell them?

8 A Whatever's written here is exactly what --
9 I even asked, "What should I write here because I
10 don't want anybody in trouble."

11 Q Is that what you --

12 A But --

13 Q -- told them prior to writing the letter?

14 A We had a conversation for maybe five
15 minutes, approximately.

16 Q Okay.

17 A And then they asked me to write a
18 statement, yes.

19 Q So during that conversation, had you
20 already said everything that's in this letter?

21 A No.

22 Q Okay.

23 A They asked me particularly.

24 Q Okay. So --

25 A Because they had gotten other people

1 telling them things. Other inmates.

2 Q Other inmates had told Chief Cox something?

3 A It was apparently reported to Chief Cox and
4 the acting lieutenant/disciplinary hearing officer.

5 Q Okay. And the report was that Mr. Redeagle
6 was too friendly with you, essentially?

7 A He brought, yes, undergarments and things
8 to me, yes.

9 Q Okay. And when you were asked about it,
10 you denied these things?

11 A Yes. I didn't want anybody to get in
12 trouble. Like I said, he's in authority over my
13 entire life.

14 Q I guess what I'm trying -- I'm trying to
15 make clear is -- or I'm trying to understand clearly
16 is did you, in fact, tell Chief Cox, "Yes, we're
17 having a inappropriate relationship but I'm willing
18 to write a letter that says otherwise," or did --

19 A Well, he just basically said, "Well, I need
20 you to write a statement." I mean, it was a very
21 brief conversation. There wasn't a whole lot of
22 discussion.

23 Q And during the conversation --

24 A They had just gotten wind of something by
25 other inmates, apparently.

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1 Q And during that conversation you denied any
2 inappropriate relationship?

3 A I just said, "Listen, I -- I just -- I
4 don't know what to do at this point in time." But,
5 yeah, I mean, I -- I wrote the letter.

6 Q But did you deny it in the verbal
7 conversation you'd had with Chief Cox prior to
8 writing the letter?

9 A The verbal conversation is -- I mean, this
10 (indicating) is what I was asked to do, period.
11 That's what I was told to do.

12 Q So you were told to write a statement that
13 was consistent with your conversation, or you were
14 told to write these specific words?

15 A Basically, I said, "What do you need me to
16 write?"

17 And that's exactly what happened. I mean,
18 you're -- you're reading it.

19 Q Okay. At that time, I guess March 19th,
20 2019 -- and just to be clear, that's the date that
21 you wrote on this letter that's Exhibit 9. Is that,
22 in fact, the date that you wrote it?

23 A If -- I mean, that's what it says, so --

24 Q Do you have any reason to believe it's a
25 date other than March 19th of 2019 that you wrote

1 that letter?

2 A No.

3 Q Okay. So probably is on March 19th of
4 2019?

5 A Correct.

6 Q Okay. And, at that time, had your
7 interaction with Christopher Redeagle been anything
8 other than conversations and letters?

9 A Yes.

10 Q Okay. What had happened, other than
11 conversations and letters at that time?

12 A He called me to his office multiple times,
13 called me to the property room after I got off work.
14 There he fondled me, kissed me.

15 What -- I mean, would you like details
16 or --

17 Q Yeah. What -- I guess, when was the first
18 time that you guys had actual physical contact?

19 A In the property room --

20 Q Okay.

21 A -- when he called me --

22 Q Do you remember about when that was?

23 A I believe it would have been around March.
24 It was in March of 2019.

25 Q Okay. Was it on this same day that you got

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1 interviewed by Chief Cox?

2 A No. I just told you, he was on vacation --

3 Q All right. He was on vacation.

4 A -- at that time.

5 Q So prior to that, presumably?

6 A In or around that area of time.

7 Q Okay. But, I mean -- just so that I'm
8 clear, the physical contact you're talking about with
9 Mr. Redeagle happened prior to this conversation you
10 had with Chief Cox?

11 A I'm not exactly sure exactly what time it
12 was. I believe -- I believe the first interaction
13 when he called me over to his -- I mean, I noted it
14 down here, but I didn't put an actual date on that.
15 But it says, "I have met with Mr. Redeagle two to
16 three times in his office."

17 Q Right.

18 A So I've noted it.

19 Q Okay. And what happened during that first
20 interaction you had with Mr. Redeagle? The first
21 physical interaction, I should say.

22 A Well, he kissed me and stuck his hand down
23 the back of my pants.

24 Q Okay. And, I guess, did anything other
25 than sticking his hands down the back of your pants

1 happen at that time?

2 A On a different occasion, it did.

3 Q But did it at that -- that first encounter?

4 A At that first encounter?

5 Q Right.

6 A He -- well, yeah, he kissed me and stuck
7 his hand down the back of my pants. Like -- yes. I
8 don't know what else you want me to tell you.

9 Q I mean, essentially, he was grabbing
10 your --

11 A Yes.

12 Q -- butt, correct?

13 A Yes.

14 Q Okay. And, I guess, for about how long did
15 this physical interaction go on that first time?

16 A They were doing some maintenance and a guy
17 walked in, and I was -- I was, like, ready to get out
18 of there, and that was a clean break for me to get
19 out.

20 Q Okay.

21 A So, I mean, approximately ten, 15 minutes
22 or so.

23 Q Okay. Do you -- and you don't know what
24 the date of that particular interaction was?

25 A I mean, no, I didn't like -- no. I have no

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1 specific date, no, but it was on or around the time
2 of all these things.

3 Q Right.

4 A Besides the letters. I think that they
5 were -- ended on the 18th.

6 Q Okay. So that was the first interaction --
7 physical interaction that you guys had that you can
8 recall?

9 A The first?

10 Q That one that you were just describing, you
11 were in the property room, he kissed you --

12 A That was the first, yes.

13 Q -- and put his hand down the back of your
14 pants?

15 A Yes. And then he called me several times
16 to his office and had my case worker -- when I got
17 off work, she called me and several guards escorted
18 me to the white house to go to his office, yes.

19 Q So when was the second -- I guess, how long
20 after that first interaction was the second
21 interaction?

22 A Approximately, a couple of days later.

23 Q Okay. And what happened during that
24 particular time?

25 Presumably, you got taken to his office?

1 A Correct.

2 Q Okay. So the first time was in the
3 property room, the second time was at his office?

4 A It happened in his office and in the
5 property room again.

6 He called me to his office. I had just
7 gotten off work. By the time I got there, they said,
8 "Oh, I think he went down to the property room"
9 because everybody else leaves. So they said, "You
10 probably just need to walk down there," so I went
11 down there.

12 Q Okay.

13 A So there's been several instances.

14 Q Okay. And so what happened on that second
15 time -- I guess, when you were in the property room
16 the second time with him that a physical interaction
17 happened?

18 A He kissed me and stuck his hand down my
19 pants and said, "Your pants shouldn't be so tight so
20 that I can take them off of you," and he put my hand
21 on his penis, for lack of a better term. I --

22 Q Like, outside the clothes, inside the
23 clothes?

24 A No, outside the clothes and asked me to
25 masturbate. Like, basically -- I mean, fondle him.

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1 Q Right.

2 A Please him.

3 Q And how long did that go on?

4 A Probably -- not very long because I was
5 very nervous and -- I mean, he even knew I was very,
6 like -- he said, "You don't act like you want me to
7 be around you anymore," and different things like
8 that. He came to work and told me that before he
9 even called me back down there. But --

10 Q Before this second incident, he said that?

11 A Correct.

12 Q And what did you say back to him?

13 A I said, "I'm just, like" -- I think it's
14 written in a letter here.

15 I said, "I just got a lot going on. I
16 don't mean to be offensive to you, but I just have a
17 lot going on," you know, in my mind.

18 Q Right.

19 A "I'm not trying to offend you, but I'm
20 uncomfortable."

21 Q Right. Okay. And so --

22 A "I just want to get home." I think that
23 was actually written in the letter. "We both know I
24 just -- I just want this thing to be over and get --
25 get to, you know, where I need to get, home."

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1 A Well, actually, like, to be specific on the
2 date, I believe it was, what, the 8th, when
3 Lieutenant Minnick pulled me in there? That was on
4 the 14th. So I was actually already released from
5 Building 8 at that time.

6 Q Okay. So it was before that?

7 A Right.

8 Q Okay.

9 A And then thereafter as well. I mean, he
10 continued to call me to his office.

11 Q After you'd gotten released from the job?

12 A Correct.

13 Q Okay. So how long after the second
14 incident did the third incident occur?

15 A I mean, it all took place between a span
16 of, like, February, March. I mean, this all
17 encompassed around about, you know, a month, month
18 and a half, like that -- the actual physical contact.

19 Q Right. So the first incident happened, and
20 then a couple of days later there was a second
21 incident. How long was it before the third incident
22 happened?

23 A Matter of days.

24 Q Okay. Another couple of days maybe?

25 A (Nodding head).

1 Q And what happened on that third incident?

2 A He brought some panties to me and said, "I
3 found you something." And he had some pictures that
4 he'd gotten off Facebook of me.

5 And he said, "But just -- you've got to --
6 you've got to hide these."

7 And so -- and then I ended up giving them
8 back to him because that had nothing to do with my
9 property box. But that's what he utilized for his
10 reasonings on calling me to his office, et cetera,
11 was to talk about this property deal.

12 Q Okay. So this third time that he came --
13 that you had one of these interactions with
14 Mr. Redeagle, he called you to his office?

15 A Correct. Through my case manager.

16 Q And you're -- in the office is whenever he
17 gave you the panties?

18 A Well, he gave me one pair when I was at
19 work in Building 8, actually cleaning the women's,
20 like, bathrooms. And there's not a camera right
21 there because I -- I mean, I was, like, very nervous.
22 And he came and just handed me a pair of pink lacy
23 panties and said, "Why don't you wear these and I'm
24 going to call you to my office later."

25 Q Okay. And then what happened?

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1 A And then there were two more pair in that
2 property box when he called me down to his office. I
3 mean, I was summoned to go and got escorted down
4 there and -- yeah, had nothing to do with what was
5 actually in my property box, but I guess he -- he
6 said he just bought them for me.

7 Q Okay.

8 A I didn't ask him to bring me anything. So
9 all so the property issue is one thing.

10 Q Right. And then you -- you said you gave
11 them back to him?

12 A Uh-huh.

13 Q How long after he gave them to you did you
14 give them back to him?

15 A I actually was, like -- what do they
16 call -- more or less, they call it a "shakedown," but
17 they go through your -- the only things that you do
18 have that have locks on them. And they're little
19 bitty lockers.

20 And they had shaken me down several times
21 and I just told him it was -- it was too -- too
22 nerve-racking for me to have those. And, like, I
23 don't -- again, I don't want to offend you or piss
24 you off because I am under your scrutiny and control
25 right now, but this is -- this is not where I want

1 this to go.

2 Q And so --

3 A Also, it's contraband, so it could get you
4 in trouble, it could get me in trouble, and that's
5 the last thing I really want.

6 Q But you realized it was against the rules
7 for him to bring --

8 A Absolutely.

9 Q -- these kind of things into the jail?

10 A Correct.

11 Q And you realized that it was against the
12 rules for you to get something like that from him?

13 A To possess them, yes.

14 Q And so you just didn't want them in your
15 possession anymore, correct?

16 A No. I never wanted them in the first
17 place.

18 (Whereupon, Exhibit Number 10 was marked for
19 identification purposes and made a part of the
20 record.)

21 Q (By Mr. Allen) Okay. I'm going to hand you
22 another document that we'll mark as Exhibit 10.

23 Have you ever seen this email?

24 A I believe I reviewed it in his (indicating)
25 office.

1 which took place of the current warden at the time.

2 Q Okay. I guess what I'm trying to find out
3 is, by this point, were you still having physical
4 meetings with Mr. Redeagle? "By this point" meaning
5 March 26th.

6 A I mean, I didn't put a -- I didn't put a
7 Rolodex in my head at that point in time. I mean,
8 there was a lot going on.

9 So to be exact, on Tuesday, March 26th, do
10 I remember if that exactly was when he kissed me and
11 called me to his office? I'm not exactly sure, but I
12 know that -- I mean, he sent the -- your question, I
13 guess, is misleading.

14 Q How's that?

15 A Because I've told you already that it all
16 took place in between February and extended into
17 March. Then he resigned.

18 Q Right.

19 A What date did he resign? That would give
20 you an accurate date.

21 Q Of what?

22 A Of the physical contact as well.

23 Q Did he -- are you saying you had physical
24 contact with him on the date he resigned?

25 A No, but -- but prior to that, like, the

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1 week before.

2 Q Okay. So the week before Mr. Redeagle
3 resigned, you guys had had a physical interaction?

4 A He had called me down to his office, yes.

5 Q And what happened during that interaction?

6 A When I came down to his office that time?

7 Q Yes.

8 A He gave me a shirt out of my property box
9 and he talked to me and he said, "Listen, I -- I just
10 don't know what's wrong with me."

11 And I said, "The thing is, you get to go --
12 I do not want to hurt your feelings. You're a great
13 guy. But I didn't -- never wanted this to escalate.
14 You get to leave at the end of the day. I don't. So
15 I have to deal with all these rumors and all
16 these" -- I mean, there's, what, 12 -- almost 1,200
17 females there at that time? Yeah. So, I mean, it's
18 not comfortable. No part of it is comfortable.

19 I mean, writing a letter, that's innocent
20 comparatively to calling me and -- and it's already
21 enough of a humbling experience to be there, much
22 less be on spotlight in a very uncomfortable way.

23 Q Okay. And so I guess he gives you a shirt
24 and you guys have this conversation. Is that all
25 that happened during that -- during this exchange?

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1 A Well, he stuck his hand down the back of my
2 pants again.

3 Q Okay. And --

4 A And then the lady that I was referring to
5 earlier that was the disciplinary hearing officer,
6 she started to walk in there.

7 Q Okay. Into his office?

8 A Uh-huh.

9 Q Okay. And that's what ended the
10 interaction?

11 A Yeah. And I just -- I basically just told
12 him that I -- like I said, "I don't want to offend
13 you, but -- and I think you're a great guy, but at
14 the end of the day you get to leave and I just don't
15 want" -- you know, basically, don't take this too far
16 in your head because apparently I -- you know, that's
17 not what I want is the whole physical thing.

18 Q Okay. And you made that clear to him at
19 that time?

20 A Right. Right. I just said, "Please
21 respect that. You know, it's stressing me out. And
22 you're wondering why I'm acting, you know, a little
23 off kilter. I'm stressed out, you know."

24 Q Right.

25 A And I don't want to be called over there

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1 all the time and get escorted over there. I mean,
2 it's just -- it's very uncomfortable.

3 And then as far as the physical contact,
4 that's even more uncomfortable.

5 Q Okay. And you made that clear to him at
6 that time?

7 A I tried.

8 Q So from my recollection of what we
9 discussed, I believe this has been three different
10 physical interactions that you all had that we've
11 discussed.

12 Were there others?

13 A I mean, that -- that's all I can really
14 recollect are several different occasions that I was
15 called to the property room, which was at least -- I
16 know that was twice for sure, and then I was called
17 to his office multiple times.

18 Q Okay. And every time that you went to his
19 office, would you say that each one of those resulted
20 in a physical interaction?

21 A Not every single time.

22 Q Okay. The one time, for instance, he just
23 gave you the underwear, that kind of thing?

24 A Well, that was two separate occasions.
25 Like, I worked in Building 8. Like I said, I was

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1 relationship," no.

2 Q Did you confirm to her in any way that
3 there was something weird going on with you and Chris
4 Redeagle?

5 A Yes, she knew.

6 Q How did you confirm it to her?

7 A I mean, "confirm"? I mean, when someone
8 says, "Hey, you know, he's coming looking for you
9 again," I mean, isn't that a little -- and I told
10 her, I said, "Listen -- yeah."

11 "What were y'all doing?"

12 I said, "He kissed me, you know, and he
13 made me feel uncomfortable."

14 And she started crying and she was, like,
15 "He makes me feel uncomfortable. He's creepy.
16 You're not the only one."

17 Q So you actually told Julia Woolsey --

18 A I admitted --

19 Q -- that he had kissed you?

20 A -- that -- yeah, that incident.
21 Absolutely.

22 Q Okay.

23 A I mean, I was -- I was pretty shaken up
24 about it.

25 Q Okay.

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1 Q Okay. I guess, when you say, "stuck his
2 hand down your pants," I think of him grabbing your
3 butt. Are you saying that something other than that
4 happened?

5 A I believe these are her words, not --

6 Q No. No. I'm asking you if, in fact, that
7 happened.

8 A I mean, he -- he did stick his hand down
9 the back of my pants, yes.

10 Q Okay. Did he ever insert himself into you?

11 A Like, his penis? No.

12 Q His fingers.

13 A I mean, they got pretty close, yeah.

14 Q Okay. But, I guess, this whole
15 "finger-banged" thing, this is just Julia Woolsey's
16 comments?

17 A Well, I mean, that's her -- that's her
18 terminology --

19 Q Okay.

20 A -- of the situation.

21 Q Okay. Do you know what she would have
22 meant by "cheating with the guy that has power over
23 us"?

24 What's "cheating with the guy?" What's
25 that mean?

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1 Q Okay. So, at this time, you are, I guess,
2 given a "New Arrival Intake," is how it's described.

3 A Uh-huh.

4 Q Do you remember having a new arrival intake
5 at Mabel Bassett?

6 A Just standard, yes.

7 Q Okay. This is normal things that happen
8 whenever you arrive at a new facility, correct?

9 A Correct.

10 Q And you'll notice there, just a few
11 questions down from the top, it says, "Have you had
12 any negative experiences, e.g., sexual victimization
13 at this facility or at a previous time?"

14 A It shows that you reported "Yes."

15 Q Do you remember reporting "Yes"?

16 A Yes.

17 Q Okay. Immediately under that it has a
18 little "Comments" section. It says, "Inmate reported
19 that she was sexual victimized as an adult. None
20 occurred while incarcerated or detained."

21 Do you remember making that report?

22 A No. They actually asked me -- and it's
23 standard. They asked me if I was the aggressor. And
24 that's exactly what they ask. Was I the aggressor in
25 any kind of a rape type incident. Like it's protocol

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1 any PREA allegations to Whitney Louis on April 4th?

2 A I believe this is, like you said, congruent
3 with this other exhibit, so --

4 Q Exhibit 16?

5 A Correct.

6 Q And in Exhibit 16, it obviously also says,
7 "Inmate denied PREA allegations. Stated she was
8 attempting to get a job."

9 So these appear to be consistent with each
10 other. I guess I'm just making sure to give you the
11 opportunity to tell me whether you believe that
12 that's inaccurate.

13 Is that accurate that you, in fact, deny
14 PREA allegations?

15 A Yeah. We -- she actually, like I -- like I
16 had stated earlier, she just wanted -- she said, "I
17 know things are going on. I know it's stressful. I
18 appreciate having you in here to do these -- like,
19 you know, organize these self-help groups,"
20 et cetera. And it was really general conversation,
21 more of like she was being, like, a friend. Like,
22 "If you need to talk to anybody, I know things are
23 going on, I know you're uncomfortable."

24 And that's basically exactly our
25 conversations. They were very, I guess, you would

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1 inside."

2 Now, I think we've discussed this a few
3 times --

4 A Uh-huh.

5 Q -- it was my understanding from your
6 earlier testimony that he had never actually
7 penetrated you with his hands or anything else. Is
8 that accurate? Did he actually penetrate you or did
9 he not?

10 A Well, what is your description of
11 "penetrate"?

12 Q I don't know, did any part of his body
13 enter inside of any part of your body?

14 A His hands.

15 Q Did it enter into your genitals?

16 A It was right there.

17 Q It was touching them, essentially?

18 A Uh-huh. And -- right -- yes, from the
19 backside.

20 Q Okay. Kind of rubbing on your genitals,
21 essentially?

22 A More or less, but, I mean, what -- I mean,
23 I guess, are you asking -- is this going back to the
24 finger-banging thing?

25 Q Yes.

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1 in the chief of security with Cox. When that
2 statement was written, her name's Ketcher.

3 Q And what was your contacts with her?

4 A That's -- she was actually in there when
5 they had me write that statement.

6 Q Okay. What, if anything, did Robin Ketcher
7 do personally to violate your civil rights?

8 A I mean, she just instructed me on what to
9 write on that statement.

10 Q And did you feel like anything she said was
11 a violation of your rights?

12 A I just -- I mean, they're authority figures
13 and they basically told me what I needed to write on
14 the -- I mean, they basically tell you what to do at
15 all times, so --

16 Q And when you say "they" in this
17 particular --

18 A Guards.

19 Q -- you mean Robin Ketcher and Mr. Cox?

20 A Specifically, yes, they called me into the
21 office and had me write that statement.

22 Q Did they tell you to write anything that
23 was untrue?

24 A Well, yeah, they basically told me what to
25 write.

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1 Q But did they tell you to write anything
2 that was untrue?

3 A Uh-huh.

4 Q Factually?

5 A Yes.

6 Q What was that?

7 A Because there was an inappropriate
8 relationship and I wrote that there wasn't.

9 Q And it's your testimony that they told you
10 to write that there was no inappropriate
11 relationship?

12 A Well, they asked me and basically told me
13 what I needed to write.

14 Q Well, they asked you and you denied
15 it; isn't that right?

16 A I basically -- yeah. Yes.

17 Q Who is -- I think you testified about this
18 person before. Who's Luke Combs?

19 A Oh, that's who -- Mr. Redeagle would use
20 that and Frank Eaton. And he would make up weird
21 names and use them on the return address when he
22 would mail in stuff, letters and cards and stuff.

23 Q Is that a real person?

24 A Luke Combs?

25 Q Yes, ma'am.

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1 Q So no?

2 A That would not have been appropriate.

3 Q Okay. I believe earlier when you were
4 answering questions from Mr. Redeagle's attorney, you
5 were shown some documents, some PREA acknowledgment
6 forms.

7 Do you remember seeing those?

8 A Yes, sir.

9 Q And you understood those forms, didn't you?

10 A Yes.

11 Q And you understood in those forms that you
12 had the express ability to report PREA violations
13 directly to Oklahoma City, didn't you?

14 A I mean, the deputy warden is in charge of
15 PREA. That's one of his jobs, actually, within the
16 prison system.

17 Q Nonetheless, it does say on those forms
18 that you can report that sort of thing directly to,
19 say, a hotline, right?

20 And we can go back --

21 A Right. Right.

22 Q -- and look at the forms if you want to?

23 A Right. Right. Right.

24 Q Yeah. And you acknowledge that there were
25 signs around the facility that shared the same